



**OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.**

*Attorneys at Law*

599 Lexington Ave, Fl 17  
New York, New York 10022  
Telephone: 212-492-2500  
Facsimile: 212-492-2501  
www.ogletree.com

Simone R. D. Francis  
(340) 714-5510  
simone.francis@ogletree.com

Marc-Joseph Gansah  
212-492-2068  
marcjoseph.gansah@ogletree.com

May 30, 2025

**VIA ECF**

The Honorable Judge Sarah L. Cave  
United States District Court for the Southern District of New  
York Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 18A  
New York, NY 10007

This case was referred for general pretrial supervision and reports and recommendations on dispositive motions. (ECF No. 6). Although Plaintiff filed proof of service and Defendants' responses to the Complaint are past due, Defendants' request at ECF No. 11 is **GRANTED**. (See ECF Nos. 7; 8). For good cause, the deadline for Defendants to respond to the Complaint is **EXTENDED** up to and including **June 30, 2025**.

The Clerk of Court is respectfully directed to close ECF No. 11.

SO ORDERED. June 2, 2025

  
SARAH L. CAVE  
United States Magistrate Judge

RE: ***Wesam Abdelzاهر v. Matthew Bridge and Google***  
Civil Action No. 1:25-cv-3496-JPC-SLC  
Extension of Time to Respond to Complaint

Dear Judge Cave:

We represent Defendants Matt Bridge and Google Inc. ("Defendants") in the above-referenced matter. Although there is no proof of service on the docket, in an abundance of caution, we respectfully request a 30-day extension of time until **June 30, 2025**, to respond to the Complaint. This is Defendants' first request to extend the time to respond to the Complaint in this action. Given our recent retention in the matter, the additional time would allow us to thoroughly investigate the allegations in the Complaint and prepare a fulsome and informed response.

The undersigned contacted Plaintiff Wesam Abdelzاهر ("Plaintiff") to obtain her consent to the extension. Plaintiff refused, stating that she did "not feel safe providing an extension." Despite Plaintiff's refusal, Defendants respectfully submit that good cause exists for the extension and that the brief additional time will not unduly delay the proceedings at this early stage.

Thank you for your consideration.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

By: /s/ Marc-Joseph Gansah  
Marc-Joseph Gansah